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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

ANIBAL RODRIGUEZ, et al. individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

GOOGLE LLC,

Defendant.

Case No. 3:20-CV-04688-RS

**JOINT STIPULATION AND
[PROPOSED] ORDER FOR RELIEF
FROM CASE MANAGEMENT
SCHEDULE**

Judge: Hon. Richard Seeborg

Courtroom: 3, 17th Floor

1 Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs Anibal Rodriguez, et al.
2 (“Plaintiffs”) and Defendant Google LLC (“Google”), collectively, the “Parties” submit this joint
3 stipulation.

4 WHEREAS, on November 22, 2021, the Court granted Plaintiffs’ Motion for Relief from
5 Case Management Schedule, extending the deadlines for the close of fact discovery, initial expert
6 witness disclosures, rebuttal expert witness disclosures, and the close of expert discovery (Dkt.
7 180);

8 WHEREAS, on February 1, 2022, the Parties stipulated to a new class certification
9 briefing schedule and hearing date consistent with the Court’s November 22, 2021 order (Dkt.
10 214), which the Court entered on February 1, 2022 (Dkt. 215);

11 WHEREAS, on May 20, 2022 (Dkt. 243), the Parties stipulated to an extension of all
12 discovery deadlines and the class certification briefing and hearing schedule to allow the Parties to
13 complete ordered and pursued discovery, which the Court entered the same day (Dkt. 244);

14 WHEREAS, on August 11, 2022, the Parties stipulated to extend deadlines for discovery,
15 class certification briefing schedule and hearing date (Dkt. 245), which the Court entered that
16 same day (Dkt. 246);

17 WHEREAS, on December 21, 2022, Plaintiffs filed a Motion for Relief from the Case
18 Management Schedule (the “Motion”), seeking to extend the deadlines for service of opening
19 expert reports by two months (Dkt. 279);

20 WHEREAS, on December 23, 2022, the Court partially granted the Motion, extending the
21 deadlines for service of opening expert reports by one month and maintaining the briefing
22 schedule on Plaintiffs’ request for a longer extension (Dkt. 282);

23 WHEREAS, on January 3, 2023, the Parties filed a joint stipulation informing the Court of
24 the Parties’ negotiations over the case schedule and extending the deadline for Google to oppose
25 the Motion (Dkt. 288), which the Court entered on January 5, 2023 (Dkt. 290);

26 WHEREAS, on January 12, 2023 the Parties filed a Joint Stipulation representing that
27 Plaintiffs withdrew the Motion (Dkt. 279), the deadline for all opening expert reports would
28 remain February 20, 2023, except: the expert report where Plaintiffs would address the data

produced as a result of the Data Production Process would be due four weeks after the date when Google completed all productions for this process and Google would have an extension of equivalent length for its report(s) that rebutted Plaintiffs' report related to the Data Production Process, and the case management schedule (Dkt. 246) would remain otherwise unchanged (Dkt. 300), which the Court entered on January 13, 2023 (Dkt. 301);

WHEREAS, Google represents that Plaintiffs' report related to the Data Production Process affected Google's experts' rebuttal to Plaintiffs' other reports, and Google asked Plaintiffs to agree to extensions of the rebuttal deadline for all reports, which in turn required slight modifications to the remaining schedule;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the Parties to this action, and pursuant to Civil Local Rules 6-2 and 7-12, that the case management schedule be amended as follows:

EVENT	CURRENT	PROPOSAL
Google's Rebuttal Reports (all except Hochman)	May 1, 2023	May 31, 2023
Google's Rebuttal to Hochman Report	May 31, 2023	May 31, 2023
Close of Expert Discovery (ECF No. 301)	June 2, 2023	July 14, 2023
Class Certification Motion (ECF No. 301)	June 9, 2023	July 20, 2023
Class Certification Opposition (ECF No. 301)	July 14, 2023	August 24, 2023
Class Certification Reply (ECF No. 301)	August 11, 2023	September 21, 2023
Class Certification Hearing (ECF No. 301)	August 24, 2023 at 1:30 p.m.	October 5, 2023

A Proposed Order is submitted concurrently herewith.

IT IS SO STIPULATED.

1 DATED: May 2, 2023

WILLKIE FARR & GALLAGHER, LLP

2 By: /s/ Benedict Y. Hur

3 Benedict Y. Hur

4 *Attorneys for Defendant Google LLC*

5 DATED: May 2, 2023

6 By: /s/ Mark Mao

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15 *Attorneys for Plaintiff*

16
17
18 **FILER'S ATTESTATION**

19 Pursuant to Civil Local Rule 5.1, I attest that all signatories listed, and on whose behalf this
20 filing is submitted, concur in the filing's content and have authorized this filing.

21
22 DATED: May 2, 2023

WILLKIE, FARR & GALLAGHER LLP

23
24 /s/ Benedict Y. Hur

25 Benedict Y. Hur
26
27
28

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**[PROPOSED] ORDER GRANTING
RELIEF FROM CASE MANAGEMENT
SCHEDULE**

Judge: Hon. Richard Seeborg

Courtroom: 3, 17th Floor

Pursuant to stipulation of the Parties, the Court hereby **ORDERS** that the new Case Management Schedule be entered as follows:

EVENT	CURRENT	PROPOSAL
Google's Rebuttal Reports (all except Hochman)	May 1, 2023	May 31, 2023
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IT IS SO ORDERED.

Dated: _____

Honorable Richard Seeborg